

THE DUBAI INTERNATIONAL FINANCIAL CENTER COURTS

IN THE COURT OF FIRST INSTANCE

WITNESS STATEMENT No.1

BETWEEN:

1 - SALAH MASRI

(the "First Claimant")

2 - IULIA VALIULLINA

(the "Second Claimant")

Claimants

and

1 - LUTFI & CO. Advocates

(the "First Defendant")

2 - HARJEET BHATIA

(the "Second Defendant")

Defendants

WITNESS STATEMENT

17 April 2026

Of Salah Masri - Litigant in Person

Filed on 17 / Apr / 2026

I, Salah Masri, Syrian National, holder of Emirates ID No. (784197943768214) and have my address at 2419, Liberty House Tower, DIFC, Dubai, UAE, do solemnly affirm as follows:

I. Unless specified otherwise, all statements made in this witness statement are based on my personal knowledge.

II. I am the First Claimant in these proceedings.

III. I provide this witness statement in support of filing the Claim Form, based on my involvement in the transaction forming the subject of these proceedings.

IV. I further confirm that the facts brought in these Proceedings Before the Court are grounded on true events, I further, confirm that these statements are never made upon personal opinions or any kind of emotions.

1. Background and The Retainer Agreement

1.1 I was named a defendant in DIFC Court proceedings under case number CFI-066-2024.

1.2 To defend myself against this claim, I appointed Lutfi & Co. Advocates and Legal Consultants the retained legal firm and Ms. Harjeet Bhatia was the assigned legal practitioner as my legal representatives.

1.3 Before executing the Retainer Agreement dated 7 October 2024, the Defendants made explicit representations concerning their ability to defend my interests. In particular, I remember that they guaranteed me comprehensive care, coordination, and their utmost efforts in the process. I acknowledge that they did not guarantee the case's outcome, which is not a claim I make; however, they did promise to represent me appropriately and to keep me updated throughout the proceedings.

1.4 Relying heavily on these professional assurances, the Second Claimant and I engaged their services and paid a around AED 75,000 in legal fees.

2. Procedural Failures and Document Production

2.1 On or around 18 March 2025, the Court issued a timetable regarding document disclosure. I promptly provided all requested documentation to the Defendants.

2.2 However, when the opposing parties served a "Request to Produce," a representative of the Defendants, Ms. Karina negligently advised me that all the documents included in the court order for

disclosure are already submitted by myself on an earlier date and there is no reason to re-file the same again.

2.3 Because of this advice, we faced early procedural complications which the Defendants failed to properly manage, because no preparation was really made when the time was helping.

2.4 I had to send many emails and reminding messages complaining on the delay of the process, I even has requested a refund before any filing was made.

3. The Unauthorized Filings

3.1 The appointed Legal Counsel, acting on my behalf before the DIFC Courts, repeatedly filed Amended Defences, Supporting Documents, and Witness Statements on multiple dates, including 10 July, 9 July, 28 July, and 4 August 2025.

3.2 The appointed Legal Counsel drafted and filed these **Statement of Defence** without providing me, or any of the other defendants, a copy of the **drafts** for review prior to submission.

3.3 I do not deny that the appointed Legal Counsel shared other related documents with me before filing, such as Witness Statements. However, they strictly withheld the drafted Defences themselves.

3.4 To the best of my knowledge, none of the associated documents (like the witness statements) contained misleading information. The only documents that were not reviewed by me are the drafted **Statement of Defences**, which I explicitly requested to see but my requests were meet with ignorance.

4. Discovery of Misleading Defences

4.1 In late August 2025, I discovered that the unreviewed Defences filed by the Defendants contained severe substantive defects. I made this discovery after accessing the DIFC Court Portal to review how our supporting documents had been presented to the Court.

4.2 While reviewing the portal, I read the opposing party's Skeleton Argument, dated 27 August 2025. This document explicitly highlighted several paragraphs within my Statement of Defence, pointing out that the legal citations referenced by my counsel were non-existent case law.

4.3 Prompted by the opposing party's Skeleton Argument, I conducted my own independent research into these cited Court cases. I was deeply shocked to verify that my legal representatives had indeed submitted multiple filings containing fabricated citations to

I. **Wrong referred case numbers or details,**

II. **Non-existent DIFC Court cases.**

4.4 It became glaringly evident that these defective pleadings were either recklessly drafted or generated through the unverified use of Artificial Intelligence.

4.5 Furthermore, upon reviewing the opposing party's supporting documents, I discovered correspondence revealing that my legal representatives had been communicating with opposing counsel to justify or mitigate this error. The Defendants engaged in these communications without my knowledge or consent. I then realized that their repeated, unauthorized filing of amended Defences was a deliberate attempt to fix and conceal their initial mistake.

4.6 On 29 August 2025, I emailed the Defendants demanding documented, written clarifications regarding these fabricated citations. In response, the First Defendant evaded my request for a written explanation and instead insisted on an in-person meeting. Their refusal to admit or explain their failure in writing severely deepened my concerns.

4.7 Consequently, to protect my position, I drafted a written declaration and filed it with the Court on 2 September 2025. In this declaration, supported by supplementary documents, I explained to the Court that I was not personally involved in the drafting of these Defences. I clarified that I was entirely deprived of the opportunity to review, comment on, or amend any of these documents because the Defendants failed to provide me with a copy prior to their official submission.

5. Termination of Representation

5.1 Given the severe risk to my case and the Defendants' failure to take immediate remedial action to correct their fabricated filings, I was left with no choice but to terminate their mandate.

5.2 On 2 September 2025, I formally removed them from the judicial record by filing a Notice of Change of Legal Representative, stepping in to act as a Litigant in Person again to mitigate any further damage to my position.

5.3 Shortly after, on 4 September 2025, the DIFC Court explicitly struck out the Defences filed by the Defendants.

6. Financial Impact and Losses Sustained

6.1 As a direct consequence of the Defendants' unauthorized and fabricated filings, the DIFC Court issued a punitive Wasted Costs Order against me and the Second, Third Defendants.

6.2 On 24 March 2026, the Court assessed these wasted costs at AED 343,953.75. This massive financial liability is entirely the result of the Defendants' professional negligence.

6.3 Furthermore, I have personally suffered additional financial losses, including the AED 75,000 paid for their substandard services, as well as around AED 50,000 paid in association with my stuck out Counterclaim and other Court fees.

7. Evidence and Supporting Documents

7.1 I have supplemented my Claim with the necessary documents in relation to the dispute, which include: genuine copies of the retainer agreement, unaltered copies of the email correspondence between the parties, copies of the related DIFC Court orders, proof of transactions, and more.

7.2 I hereby confirm that all of the relied upon Supporting Documents are indeed:

I. True.

II. Unaltered.

III. Verifiable.

7.3 I will supplement my claim with further related documents that are within my possession or that I am capable of obtaining upon court order/direction.

7.4 The List of Supporting documents I rely upon at this stage contains between 24 to 27 documents, which are referenced in the Particulars of Claim below each relevant paragraph.

7.5 The supporting documents' titles are changed to (Annexure) followed by a referencing number.

Statement of Truth

I believe that the facts stated in this Witness Statement are true.

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Salah Masri



16 April 2026.